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9 COUNTY OF SANTA CLARA

E-FILED - 9/17/07

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12
13

14 YUET LAN SO,

) No. C06-02657 RMW

15 Plaintiff

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16 v.
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28)
Defendants.

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DISCOVERY CUT OFF AND
TO CONTINUE THE TRIAL DATE**

(Civil L.R. 6-2)

COUNTY OF SANTA CLARA,
PROBATION DEPARTMENT OF THE
COUNTY OF SANTA CLARA, and
DOES 1 through 50, inclusive

Pursuant to Civil L.R. 6-2, and the accompanying Declaration of Cheryl A. Stevens, the parties hereby stipulate and respectfully request an order extending the discovery cut-off dates in this matter and continuing the trial date for the following reasons:

1. Trial in this matter is presently set for October 9, 2007. The parties participated in private mediation on April 16, 2007 and plaintiff presented the County of Santa Clara with an irrevocable offer that must be considered by the County Board of Supervisors.

2. The parties are working on settling this matter; however the County will not be able to consider plaintiff's offer until August 2007 because the Board is on its summer break and will not reconvene until August 2007.

3. The parties agree that in the interest of judicial economy and in an attempt to provide the County with an opportunity to fully consider plaintiff's offer of settlement before either

1 party incur further time and expense of completing the discovery necessary to prepare this
2 matter for trial. **Last Day to Hear Dispositive Motions December 21, 2007*

3 4. The parties therefore propose the following dates:

4 Last day to: **Pretrial Conference* January 24, 2008

5 • complete fact discovery October 5, 2007

6 • complete expert discovery November 2, 2007

7 • complete pretrial disclosures January 18, 2008 (11)

8 • complete joint pretrial statement January 25, 2008 (18)

9 Trial Date February 4, 2008

10 All other pretrial dates, discovery due dates and dates noted in the case management order
11 shall be changed per the Federal Rules, in accordance with a February 4, 2008 trial date.

12 5. This is the first request to continue the trial date in this matter.

13 6. This Stipulation is executed in two parts, faxed to the parties and may be e-filed with
14 the Court upon receipt of the executed fax. Plaintiff will mail the original to attorney Cheryl A.
15 Stevens who will retain said originals in her files.

16 IT IS SO STIPULATED.

17 Dated: June 21, 2007

Respectfully submitted,

18 ANN MILLER RAVEL
19 County Counsel

20 By: /S/
21 CHERYL A. STEVENS
22 Deputy County Counsel

23 Attorneys for Defendant
COUNTY OF SANTA CLARA

24 Dated: June 25, 2007

25 By: CHARLES A. BONNER
26 *for* CHARLES A. BONNER
Attorney for Plaintiff

27 IT IS SO ORDERED.

28 Dated: 9/17/07

Ronald M. Whyte
Judge of the United States District Court